

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RICHARD HANSON)	
Plaintiff,)	NO. 3:18-cv-00524
)	
v.)	
)	JUDGE TRAUGER
JOHN MCBRIDE and JAM)	JURY DEMAND
PRODUCTIONS d/b/a BLACKBIRD)	
STUDIOS)	
Defendant)	

**PLAINTIFF’S MOTION FOR LIQUIDATED DAMAGES
PREJUDGMENT INTEREST**

Pursuant to 29 U.S.C. 216(b), Plaintiff Richard Hanson (“Plaintiff” or “Mr. Hanson”), by and through counsel, respectfully requests that he be awarded liquidated damages or, alternatively, prejudgment interest. In support of this motion, Mr. Hanson relies on the memorandum of law filed contemporaneously and on the record as a whole.

The FLSA allows the Court to award any damages that will effectuate the purpose of the FLSA anti-retaliation provision, which is to vindicate an employee’s rights and to foster an environment where employees feel free to come forward with concerns. Blackbird Studios, under John McBride, fostered the exact opposite type of environment – one which employees, particularly Richard Hanson, face career suicide in the Nashville recording music industry by complaining about FLSA violations. The record as a whole make that clear, and the jury was persuaded by Mr. Hanson’s case. An award of liquidated damages in the amount of \$159,242, which is double the entire jury verdict, will help Plaintiff vindicate his rights and will encourage

Blackbird Studios to begin a dramatic overhaul of its culture so that, in the future, employees feel free to voice their concerns.

In the alternative, Plaintiff requests that he be awarded prejudgment interest on the back pay award in an amount deemed appropriate by the Court, as required by Sixth Circuit law.

For these reasons, Plaintiff Richard Hanson respectfully requests that this Court award him liquidated damages in the amount of \$159,242, or at a minimum \$59,242 to reflect the back pay award, or prejudgment interest.

/s Brian C. Winfrey
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing Motion Re: Liquidated Damages and Prejudgment Interests was electronically mailed to the Attorney for Defendant of Neal & Harwell, Kendra Samson and Bill Ramsey, this the 13th day of April 2020.

/s Brian C. Winfrey
Brian C. Winfrey